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December 9, 1999

Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
• **December 1999 Monthly Report**

Dear Mr. McAteer,

Enclosed is the December 1999 Monthly Report for the Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. M. Light", is written over the typed name.

D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc:

T. Gouger - USACE
C. Morin - IEPA
Mayor M. King - Cahokia
Sauget File - Solutia
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Monthly Report

Date of Report: December 9, 1999
Period Covered: November 1 - November 30, 1999
Next Report Period: December 1, 1999 - December 31, 1999

Work Performed during the reporting period

1. Completed collection of all groundwater samples from the former screened interval of the damaged fill area wells EE-02, EEG-103, EEG-105, EE-12, EE-13, EE-14, EE-15 and EEG-111.
2. Completed the magnetometry survey of Site I. Magnetometry is now completed for all sites (G, H, I, L & N).
3. Collection of downgradient alluvial aquifer samples is underway.
4. Waste borings on Site N are underway. Upon completion, this will complete all waste borings for all Sites (N, H, I, L & N).
5. Completed soil gas surveys using MIP. Soil gas surveys are now complete on all Sites (G, H, I, L & N).
6. Completed collection of soil samples (surface and shallow subsurface) along all 7 transects.
7. Grain size analysis adjacent to Site N is underway.
8. Continued taking groundwater level readings in existing wells and newly installed piezometers.

Work scheduled for next reporting period

1. Sample collection for treatability studies / pilot test.
 2. Re-attempt to collect upgradient alluvial samples at EE-04 (100'), EE-20 (60' & 100') and EEG-108 (60' & 100').
 3. Background soil sample collection (surface and shallow subsurface soils).
 4. Slug testing at Sites G, H, I, L & N.
 5. Sediment sampling in Dead Creek and the Borrow Pit for industry-specific and broad-scan analyses.
 6. 4Q99 ground water elevation monitoring.
 7. Boundary trenching on Site N.
 8. Fill area interior trenching (Except I - due to lack of access).
 9. GPR and EM on Site I.
 10. Soil gas survey transects east of Site I and NE, SE of Site H.
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Problems and Solutions

- Boundary Trenching and Center Trenching on Site I is delayed because Cerro Copper has not granted access for those purposes. Final completion schedule may be delayed.
- Encountered difficulty in obtaining upgradient alluvial aquifer samples from upgradient wells EE-04, EE-20 and EEG-108 (ex. the 60 ft level at EE-04). Recommending new methodology to obtain the samples.
- Rogers Cartage has refused to grant access to its property for three tasks required by the SSP: background soil samples; background soil gas samples; and background groundwater samples. Pending agreement to access by the Village of Sauget, Solutia and USEPA have agreed to move to property owned by the Village of Sauget for collection of the soil and groundwater samples. The Village is scheduled to act on Solutia's access request for the additional work at its regularly scheduled Council meeting December 14.

The soil gas samples, however, **MUST** be collected on the Rogers Cartage property - if they are collected at all. In addition, the soil gas samples **MUST** be collected the week of December 13, at the latest - since Solutia will demobe all soil gas sampling equipment at the end of that week. Assistance from USEPA has been requested to gain access to Rogers Cartage for the soil gas samples.

- Identification of the western boundary of Site G cannot be determined per the plans and methods approved in the SSP. Solutia is preparing a "deviation report" and will recommend alternative methodology to the Agency for completing the determination.

Submittal Schedule Status (see attached)

- Attached schedule revised consistent with approved SSP.

Issues under review

- **Dead Creek Flooding** - No change in this report period.
A hydraulic study of Dead Creek has been completed. Preliminary results indicate that elimination of the restricted culverts will not appreciably affect the flooding conditions. A supplemental study was completed and submitted to the Agencies on July 30 for review.
- **UAO to address flooding** - U. S. EPA UAO - Docket No. V-W-99-C-554 - dated June 21, 1999 was issued to Solutia and received June 28, 1999. The UAO requires replacement of the culverts on Dead Creek to address flooding of Dead Creek. An alternative proposal to address the cause of the flooding and the contaminated sediments directly was made to U. S. EPA by Solutia July 8 at a conference in Cahokia. This proposal was formally submitted to U. S. EPA in Solutia's July 17, 1999 Response to the UAO. As committed to in the July 8 Cahokia conference and repeated in Solutia's July 17, 1999 Response, Solutia submitted to U.S. EPA in a July

30, 1999 correspondence, commitment to implement some additional short term plans to address the flooding and the sediments under the UAO. The Agency responded to Solutia's proposals in a September 24, 1999 letter. In summary, the Agencies approved replacement of the culverts at Cargill Road and the Terminal Railway ROW; requested a work plan for the proposed installation of facilities to pump water from Sector B to the American Bottoms Treatment plant; and agreed conceptually and requested additional discussions and information on the proposal to remove contaminated sediments from Sector B and contain in an on-site double lined containment cell.

This Report Period

- Work this report period on culvert installation replacement at Cargill Road and the Terminal Railway ROW consisted of completion of the design and access procurement. Access from the Terminal RR has not yet been obtained but progress is continuing.
- On November 8, 1999, Solutia submitted an evaluation of alternatives to an on-site containment cell for dealing with the contaminated sediments from Sector B.
- On December 3, Solutia submitted an on-site containment cell design for containing the Sector B contaminated sediments. A design review meeting is planned for January 5 in Sauget.

Plans for Next Report Period

- Complete all necessary access procurement for culvert replacement.
- Begin and complete geotechnical investigatory work for culvert replacement.
- Begin procurement of materials for culvert replacement.
- Deliver a TSCA Technical Requirements Compliance Demonstration document to the Agency (Completed December 6)
- Review with the Agency the design of the contaminated Sector B sediments Containment Cell design (Scheduled January 5, 2000).

Comments:

January 21, 1999 Sauget Area I AOC
SCHEDULE

(11/99 Revision)

- | | |
|--|---|
| 1. Designation of Contractor | Completed 3/10/99 ¹ |
| 2. Designation of Other Contractors | 5 Business Days Before Start of Work |
| 3. Designation of Project Coordinator | Completed |
| 4. Submit Support Sampling Plan (SSP) | Submitted February 22, 1999 |
| 5. Submit Revised SSP | April 8, 1999 ²
June 25, 1999 ³
August 13, 1999 ⁴
September 9, 1999⁵ Approval |
| 6. Obtain Access Agreements | July 1, 1999 ⁶
September 17, 1999 ⁷
October 1, 1999 ⁸ |
| 7. Submit Health and Safety Plan (HASP) | Approved September 9, 1999 |
| 8. Submit Quality Assurance and Sampling Plan (QAPP) | Approved September 9, 1999 |

¹ Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

² Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

³ April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25th as required.

⁴ June 25th SSP submittal disapproved July 16, 1999 and resubmitted August 13, 1999.

⁵ August 13, 1999 SSP submittal as revised August 30, 1999 and September 7, 1999 received final Agency approval on September 9, 1999.

⁶ Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

⁷ Access agreements update issued August 15, 1999 with request to extend deadline to September 17, 1999. Extensions to September 17, 1999 was granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.

⁸ Access agreements update issued September 17, 1999 with request to extend deadline to October 1, 1999. Extensions to October 1, 1999 was granted by Mike McAteer in a September 21, 1999 e-mail to Mike Light

January 21, 1999 Sauget Area I AOC

SCHEDULE (Cont.)

(11/99)

9. Sampling Notification	10 Business Days Prior to Start of Work ⁹
10. Submit Data Report	01/09/01 ¹⁰
11. Submit EE/CA Report	60 Calendar Days After Data Report Submittal - 03/09/01
12. Submit Revised EE/CA Report	21 Calendar Days After Receipt of EPA Comments
13. Submit RI/FS Report	90 Calendar Days After Data Report Submittal - 04/09/01
14. Submit Revised RI/FS Report	21 Calendar Days After Receipt of EPA Comments
15. Progress Reports	Monthly Beginning February 19, 1999 ¹¹

⁹ Notification given on August 19, 1999 that Air Sampling will begin on September 7, 1999. Per 9-2-99 phone conversation with Mike McAteer, the 10 day notification requirement can be treated as a "Day 1" requirement only, which has already been met.

¹⁰ Per SSP - 16 mo. from SSP approval date of 9/9/99.

¹¹ Pursuant to decisions in 9-1-99 EPA Kickoff Meeting - Report period for the monthly report will be changed to the calendar month to coincide with project field work - due on the 10th of the month.